

Hon. Paul A. Engelmayer  
United States District Court  
for the Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007

July 12, 2024

**Re: Jane Street Group, LLC v. Millennium Management LLC, Douglas Schadewald,  
and Daniel Spottiswood, No. 1:24-cv-02783**

Dear Judge Engelmayer:

We write on behalf of Defendants Douglas Schadewald (“Schadewald”), Daniel Spottiswood (“Spottiswood,” and together with Schadewald, “Individual Defendants”) and Millennium (together with Individual Defendants, “Defendants”). Pursuant to Local Civil Rule 7.1.(d) and Individual Practice Rule 4.B, we seek permission to file under seal Defendants’ Corrected Letter Motion to Compel Document Discovery (the “Corrected Letter Motion to Compel”). An identical version of the Corrected Letter Motion to Compel was previously filed under seal at Dkt. 146, but was inadvertently not accessible to the parties on the docket, and therefore Defendants are re-filing it today. At Plaintiff’s request, Defendants also seek to re-set the deadline applicable to the Motion to Seal filed yesterday at Dkt. 145.

The Corrected Letter Motion to Compel discusses areas of discovery related to Jane Street’s business, and cites to, paraphrases, or quotes from certain exhibits previously filed under seal at Dkt. 147 that were produced by Jane Street and designated as Highly Confidential – Attorneys Eyes Only, or Highly Confidential – Attorneys and Individual Defendants’ Eyes only. Because Defendants believe that Plaintiff will seek to seal some or all of the Corrected Letter Motion to Compel, Defendants request leave to provisionally file the Corrected Letter Motion to Compel under seal. Defendants will meet and confer with Plaintiff regarding sealing or redactions of the Letter Motion, and to the extent Plaintiff consents to redactions, file public a redacted version by close of business on Tuesday, July 16, 2024. Defendants reserve the right to challenge any redactions proposed by Plaintiff.

Additionally, at the request of Plaintiff, Defendants respectfully request that the deadline for filing any redactions or further sealing motion in respect of yesterday’s Letter Motion to Seal (Dkt. 145) be re-set to Tuesday, July 16, 2024, to be consistent with this sealing motion.

Respectfully submitted,

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